

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-CV-00950-LO-JFA

PLAINTIFFS' PROPOSED VERDICT FORM

We the jury, in the above-captioned action, answer the questions submitted to us as follows:

Question 1: Contributory Infringement

Is Cox liable for contributory infringement of Plaintiffs' copyrighted works?

Answer: Yes _____ No _____

Please proceed to question 2

Question 2: Vicarious Liability

Is Cox vicariously liable for infringement of Plaintiffs' copyrighted works?

Answer: Yes _____ No _____

If you answered No to both questions 1 and 2, you should sign the form and return it to the clerk.

If you answered Yes to either question 1 or 2 (or both), you should proceed to Questions 3, 4 and 5.

Question 3: Number of Works Infringed

Plaintiffs have asserted infringement claims for 10,017 works. What is the number of works you find were infringed?

_____ (up to 10,017)

Question 4: Willfulness

Was Cox's conduct willful?

Answer: Yes _____ No _____

Question 5: Damages

If Not Willful	<i>You must award damages between \$750 and \$30,000 per work infringed</i>
If Willful	<i>You must award damages between \$750 and \$150,000 per work infringed</i>

What amount of statutory damages per copyright infringed do you award to Plaintiffs?

Amount: \$ _____ per work

Foreperson, please sign the verdict form. _____

THANK YOU FOR YOUR TIME AND SERVICE.

Dated: December 1, 2019 Respectfully submitted,

/s/ Scott A. Zebrak

Scott A. Zebrak (VSB No. 38729)

Matthew J. Oppenheim (*pro hac vice*)

Jeffrey M. Gould (*pro hac vice*)

Kerry Mustico (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20015

Tel: 202-480-2999

Attorneys for Plaintiffs